

MEMO ENDORSED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



APR 21 2008

Zurab Kakushadze,
A46-132-266

Plaintiff,

) 07 Civ. 8338 (DCF)

-against-

MICHAEL CHERTOFF, SECRETARY OF THE
DEPARTMENT OF HOMELAND SECURITY
and

ROBERT MUELLER, DIRECTOR,
FEDERAL BUREAU OF INVESTIGATION
Defendants.

) ECF Case

)
) MOTION FOR EXTENSION FILED
) DCCB
DATE FILED: 4/22/08

REQUEST FOR AN EXTENSION OF TIME TO COMPLETE FACT DISCOVERY

Comes now the Plaintiff, ("Plaintiff or "Mr. Zurab Kakushadze"), by and through his attorneys, the Law Office of Jan H. Brown, PC and pleads as follows:

We hereby request an additional two weeks in which to complete fact discovery due April 30, 2008.

We have left a message with Dan Filor, Opposing Counsel, to ask for his consent.

This request is in response to previous extensions filed by both parties, and to the size of the Defendants' Reply Memorandum in Further Support of Defendant's Motion to Dismiss. Because of these factors and employee scheduling conflicts within our office, we respectfully request that this extension be granted.

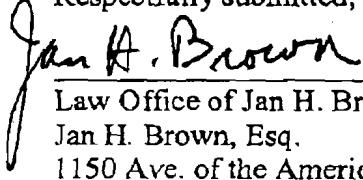
Dated: New York, New York

April 21, 2008

SO ORDERED: DATE: 4/22/08


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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,



Law Office of Jan H. Brown, PC
Jan H. Brown, Esq.
1150 Ave. of the Americas, Ste. 700
New York, NY 10036

Counsel for Plaintiff